

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

**CERTIFICATION OF NO RESPONSE OR OBJECTION REGARDING
CITY OF DETROIT’S MOTION FOR AN ORDER (I) DETERMINING
THAT JAMIE SIMPSON IS IN VIOLATION OF THE PLAN OF
ADJUSTMENT AND THE ORDER EXPUNGING HER CLAIM, AND
(II) REQUIRING DISMISSAL OF HER STATE COURT LAWSUIT**

On June 16, 2017, the City Of Detroit (“City”) filed its *Motion for an Order (I) Determining That Jamie Simpson Is in Violation of the Plan of Adjustment and the Order Expunging Her Claim, and (II) Requiring Dismissal of Her State Court Lawsuit* (“Motion”). [Doc. No. 11916]. The Motion was served via the Court’s CM/ECF system and via first class mail as described in the Certificate of Service attached to the Motion. *See Certificate of Service* Exhibit A.

No response or objection to the Motion was filed with the Court and the time to do so has passed. The City respectfully requests that the Court enter an order in substantially the same form as the one which was attached to the Motion. *See Proposed Order* Exhibit B.

Respectfully submitted,

By: /s/ Marc N. Swanson

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ATTORNEYS FOR THE CITY OF DETROIT

DATED: July 6, 2017

Exhibit A

EXHIBIT 4 – CERTIFICATE OF SERVICE

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
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CERTIFICATE OF SERVICE

The undersigned certifies that on June 16, 2017, the *City of Detroit's Motion for an Order (I) Determining That Jamie Simpson Is in Violation of the Plan of Adjustment and the Order Expunging Her Claim, and (II) Requiring Dismissal of Her State Court Lawsuit* was filed and served via the Court's electronic case filing and notice system and served upon the individuals listed below via first class mail:

Jamie Simpson
c/o David J. Jarrett
David J. Jarrett, P.C.
12820 Ford. Rd., Suite 1
Dearborn, MI 48381

L. Louie Andreopoulos
David T. Hill
Andreopoulos & Hill, PLLC
Attorneys for Plaintiff
28900 Woodward Avenue
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DATED: June 16, 2017

By: /s/ Marc N. Swanson

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Exhibit B

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

**ORDER GRANTING CITY OF DETROIT’S MOTION FOR AN ORDER
(I) DETERMINING THAT JAMIE SIMPSON IS IN VIOLATION OF THE
PLAN OF ADJUSTMENT AND THE ORDER EXPUNGING HER CLAIM,
AND (II) REQUIRING DISMISSAL OF HER STATE COURT LAWSUIT**

This matter, having come before the court on the *City of Detroit’s Motion for an Order (I) Determining That Jamie Simpson Is in Violation of the Plan of Adjustment and the Order Expunging Her Claim, and (II) Requiring Dismissal of Her State Court Lawsuit* (“Motion”), upon proper notice and a hearing, the Court being fully advised in the premises, and there being good cause to grant the relief requested,

THE COURT ORDERS THAT:

1. The Motion is granted.
2. Within five days of the entry of this Order, Jamie Simpson shall dismiss, or cause to be dismissed, with prejudice the City of Detroit from Case No. 13-016462-NF filed in the Circuit Court for the County of Wayne, Michigan (“State Court Lawsuit”).

3. Jamie Simpson is permanently barred, estopped, and enjoined from asserting any claims described in the State Court Lawsuit against the City of Detroit or property of the City of Detroit, in the State Court Lawsuit or in any other action or proceeding.

4. The Court retains jurisdiction over any and all matters arising from the interpretation or implementation of this Order.